

Mark A. Hutchison (4639)  
Sandra S. Robertson (5504)  
Stuart J. Taylor (14285)  
HUTCHISON & STEFFEN, PLLC  
10080 West Alta Drive, Suite 200  
Las Vegas, NV 89145  
Tel: (702) 385-2500  
Fax: (702) 385-2086  
[mhutchison@hutchlegal.com](mailto:mhutchison@hutchlegal.com)  
[srobertson@hutchlegal.com](mailto:srobertson@hutchlegal.com)  
[staylor@hutchlegal.com](mailto:staylor@hutchlegal.com)

*Attorneys for Defendants Desert Health Care  
Facilities Inc. d/b/a Highland Manor  
Associates, Highland Manor and Drew Banford*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

NEW HORIZON HOME CARE, LLC and  
GUIDING LIGHT HOSPICE, INC.

Plaintiffs,

v.

PHC-ELKO, INC. dba NORTHEASTERN  
NEVADA REGIONAL HOSPITAL;  
HORIZON HOSPICE, INC.; GENESIS  
HOSPICE, LLC; GENESIS HOME HEALTH  
SERVICES, INC.; DESERT HEALTH CARE  
FACILITIES INC. dba HIGHLAND MANOR  
ASSOCIATES; HIGHLAND MANOR; ELKO  
HIGHLAND VILLAGE OF ELKO; DREW  
BANFORD; BILLIE JEAN CRAWFORD,  
TRAVIS SPENCER, QUERUBIN IGUBAN,  
JR., M.D.; DEBRA ANDERSON;  
MARISSELLA (CHELLA) ELLIOT, ALICE  
ALLEN, et al

Defendants.

Case No. 3:19-CV-00521-RCJ-WGC

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO RESPOND TO  
SECOND AMENDED COMPLAINT  
(FIRST REQUEST)**

Pursuant to Local Rules IA 6-1, Plaintiffs NEW HORIZON HOME CARE, LLC and  
GUIDING LIGHT HOSPICE, INC. ("Plaintiffs") and Defendant DESERT HEALTH CARE  
FACILITIES INC. d/b/a HIGHLAND MANOR ASSOCIATES, HIGHLAND MANOR and DREW  
BANFORD ("Defendant") (collectively, the "Parties") hereby stipulate and agree as follows:

1. On June 19, 2020, Plaintiff filed its Second Amended Complaint. (ECF No. 124);;

2. Defendant's deadline to respond to the Second Amended Complaint is July 6, 2020;

4. The Parties stipulate and agree that the Defendant's shall have until July 28, 2020 to file their responsive pleading to Plaintiffs' Second Amended Complaint; and

5. This is the first request for an extension of time to respond to Plaintiffs' Second Amended Complaint.

In view of the foregoing, good cause supports this stipulated Motion. The Parties respectfully request that the Court grant this Motion and extend Defendant's deadline to file an Answer or responsive pleading to the Second Amended Complaint to July 28, 2020.

**IT IS SO STIPULATED.**

DATED this 30<sup>th</sup> day of June, 2020

JOSEPH C. ALAMMILLA, PLLC

/s/ Joseph C. Alamilla

Joseph Carlos Alamilla

P.O. Box 543

Centerville, UT 84014

801-232-2666/Fax: 866-254-9597

[joseph@jcalegalsolutions.com](mailto:joseph@jcalegalsolutions.com)

Stephen S. Kent

KENT LAW, PLLC

201 W. Liberty, Suite 320

Reno, NV 89501

775-234-9800/Fax: 702-324-9803

[skent@skentlaw.com](mailto:skent@skentlaw.com)

*Attorney for Plaintiffs*

DATED this 30<sup>th</sup> day of June, 2020

HUTCHISON & STEFFEN, PLLC

/s/ Sandra S. Robertson

Mark A. Hutchison (4639)

Sandra S. Robertson (5504)

Stuart J. Taylor (14285)

10080 West Alta Drive, Suite 200

Las Vegas, NV 89145

702-385-2500/Fax: 702-385-2086

[mhutchiso@hutchlegal.com](mailto:mhutchiso@hutchlegal.com)

[srobertson@hutchlegal.com](mailto:srobertson@hutchlegal.com)

[staylor@hutchlegal.com](mailto:staylor@hutchlegal.com)

*Attorneys for Defendants Desert Health Care*

*Facilities Inc. d/b/a Highland Manor*

*Associates, Highland Manor and Drew Banford*

**ORDER**

IT IS SO ORDERED.

DATED this 6th day of July, 2020

William G. Cobb

U.S. Magistrate Judge